

Fill in this information to identify the case:

Debtor 1 MARIAN A. MURPHY

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania

Case number 1:18-bk-03400-HWV

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: Freedom Mortgage Corporation

Court claim no. (if known):

6

Last 4 digits of any number you use to identify the debtor's account: 6501

Property address: 1641 Pebble Brook Lane

Number Street  
Harrisburg, PA 17110  
City      State      ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: MM/DD/YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ 4,482.58

Four (4) payments between 08/01/2023 – 11/01/2023 of \$1,241.29 each, less suspense \$482.58

b. Total fees, charges, expenses, escrow, and costs outstanding:

+(b) \$ 1,180.00

Two (2) Notices of Postpetition Mortgages Fees, Expenses, and Charges as follows:

\$810.00 on 03/11/2020 and \$370.00 on 04/12/2021

c. Total. Add lines a and b.

(c) \$ 5,662.58

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

08/01/2023  
MM/DD/YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/Ryan Starks Date 11/15/2023  
Signature

Print Ryan Starks (330002) Title Attorney  
First Name                    Middle Name                    Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.  
Number                    Street

Winston-Salem, NC 27103  
City                    State                    ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Harrisburg Division*

IN RE:  
**MARIAN A. MURPHY**

Freedom Mortgage Corporation,  
Movant

vs.

**MARIAN A. MURPHY ,**  
Debtor

Case No. 1:18-bk-03400-HWV  
Chapter 13

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Chad J. Julius, Debtor's Attorney  
8150 Derry Street, Suite A  
Harrisburg, PA 17111

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive  
Suite A  
Hummelstown, PA 17036

United States Trustee, US Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102

Via First Class Mail:

Marian A. Murphy  
1641 Pebble Brook Lane  
Harrisburg, PA 17110

Date: November 15, 2023

/s/Ryan Starks

Ryan Starks, PA Bar No. 330002  
Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
3825 Forrestgate Drive  
Winston Salem, NC 27103  
Telephone: (844) 856-6646  
Facsimile: (704) 369-0760  
E-Mail: PABKR@brockandscott.com

Loan #:	
BK Case #:	1803400
Name:	Murphy
BK Filed	8/15/2018

Date Received	Contractual Due Date	Petition Due Date	Pre	Payment Amount	Amount Due	Difference	Post Suspense	Pre Suspense	Fees	Contractual from Pre	Comments
9/4/2018		9/1/2018		\$ 1,089.19	\$ 1,089.19	\$ -	\$ -	\$ -			Balance at Filing
9/17/2018				\$ 270.00		\$ 270.00	\$ 270.00	\$ -			
9/19/2018						\$ -	\$ 270.00	\$ -			
10/16/2018		10/1/2018		\$ 1,089.19	\$ 1,089.19	\$ -	\$ 270.00	\$ -			
11/14/2018		11/1/2018		\$ 1,089.19	\$ 1,089.19	\$ -	\$ 270.00	\$ -			
12/27/2018		12/1/2018		\$ 1,089.19	\$ 1,089.19	\$ -	\$ 270.00	\$ -			
1/23/2019		1/1/2019		\$ 1,089.19	\$ 1,089.19	\$ -	\$ 270.00	\$ -			
3/19/2019		2/1/2019		\$ 1,089.19	\$ 1,089.19	\$ -	\$ 270.00	\$ -			
4/11/2019		3/1/2019		\$ 1,090.00	\$ 1,089.19	\$ 0.81	\$ 270.81	\$ -			
5/30/2019		4/1/2019		\$ 1,020.00	\$ 1,089.19	\$ (69.19)	\$ 201.62	\$ -			
7/30/2019		5/1/2019		\$ 900.00	\$ 1,089.19	\$ (189.19)	\$ 12.43	\$ -			
8/2/2019						\$ -	\$ 12.43	\$ -			
9/17/2019		9/1/2019		\$ 1,164.00	\$ 1,163.64	\$ 0.36	\$ 12.79	\$ -			
9/23/2019						\$ 12.43	\$ (12.43)	\$ 0.36	\$ -		Suspense per MFR Stip
9/30/2019				\$ 908.30	\$ 908.30	\$ -	\$ 0.36	\$ -			MFR stip 1
10/1/2019			\$ 155.79			\$ -	\$ 0.36	\$ 155.79			
10/1/2019						\$ -	\$ 0.36	\$ 155.79			
10/16/2019			\$ 184.13			\$ -	\$ 0.36	\$ 339.92			
10/16/2019		10/1/2019		\$ 1,164.00	\$ 1,163.64	\$ 0.36	\$ 0.72	\$ 339.92			
10/30/2019				\$ 454.15		\$ 454.15	\$ 454.87	\$ 339.92			
11/12/2019			\$ 528.57			\$ -	\$ 454.87	\$ 241.30	\$ 627.19	PMT	
11/18/2019				\$ 1,106.00	\$ 908.30	\$ 197.70	\$ 652.57	\$ 241.30			MFR Stip 2
11/26/2019		11/1/2019		\$ 1,420.79	\$ 1,163.64	\$ 257.15	\$ 909.72	\$ 241.30			
12/10/2019				\$ 1,164.00	\$ 908.30	\$ 255.70	\$ 1,165.42	\$ 241.30			MFR Stip 3
12/18/2019			\$ 352.38			\$ -	\$ 1,165.42	\$ 593.68			
1/7/2020		12/1/2019		\$ 910.00	\$ 1,163.63	\$ (253.63)	\$ 911.79	\$ 593.68			
1/22/2020				\$ 910.00	\$ 908.30	\$ 1.70	\$ 913.49	\$ 593.68			MFR Stip 4
1/23/2020			\$ 352.38			\$ -	\$ 913.49	\$ 318.87	\$ 627.19	PMT	
2/4/2020		1/1/2020		\$ 254.00	\$ 1,163.63	\$ (909.63)	\$ 3.86	\$ 318.87			
2/19/2020			\$ 352.39			\$ -	\$ 3.86	\$ 44.07	\$ 627.19	PMT	
3/3/2020		2/1/2020		\$ 1,165.00	\$ 1,163.63	\$ 1.37	\$ 5.23	\$ 44.07			
3/24/2020			\$ 528.56			\$ -	\$ 5.23	\$ 572.63			
3/31/2020				\$ 865.00		\$ 865.00	\$ 870.23	\$ 572.63			
4/27/2020			\$ 352.39			\$ -	\$ 870.23	\$ 297.83	\$ 627.19	PMT	
5/12/2020		3/1/2020		\$ 299.00	\$ 1,163.63	\$ (864.63)	\$ 5.60	\$ 297.83			
5/13/2020			\$ 339.92			\$ -	\$ 5.60	\$ 10.56	\$ 627.19	PMT	
5/27/2020		4/1/2020		\$ 1,165.00	\$ 1,163.63	\$ 1.37	\$ 6.97	\$ 10.56			
6/11/2020			\$ 339.92			\$ -	\$ 6.97	\$ 350.48			
7/7/2020		5/1/2020		\$ 1,165.00	\$ 1,163.63	\$ 1.37	\$ 8.34	\$ 350.48			
7/21/2020			\$ 339.93			\$ -	\$ 8.34	\$ 63.22	\$ 627.19	PMT	
8/25/2020			\$ 509.89			\$ -	\$ 8.34	\$ 397.13	\$ 175.98	Escrow	
9/23/2020			\$ 339.91			\$ -	\$ 8.34	\$ 737.04			
9/29/2020						\$ -	\$ 873.34	\$ 737.04			

Loan #:	
BK Case #:	1803400
Name:	Murphy
BK Filed	8/15/2018

Date Received	Contractual Due Date	Petition Due Date	Pre	Payment Amount	Amount Due	Difference	Post Suspense	Pre Suspense	Fees	Contractual from Pre	Comments	Principal	Interest	Principal Balance
9/29/2020				\$ 865.00		\$ 865.00	\$ 873.34	\$ 737.04						
10/22/2020				\$ 341.82		\$ -	\$ 873.34	\$ 330.84		\$ 748.02	Escrow			
11/11/2020				\$ 171.86		\$ -	\$ 873.34	\$ 502.70						
11/24/2020		6/1/2020		\$ 1,300.00	\$ 1,163.63	\$ 136.37	\$ 1,009.71	\$ 502.70						
12/8/2020		7/1/2020		\$ 1,300.00	\$ 1,163.63	\$ 136.37	\$ 1,146.08	\$ 502.70						
12/24/2020				\$ 515.56		\$ -	\$ 1,146.08	\$ 1,018.26						
1/28/2021				\$ 515.56		\$ -	\$ 1,146.08	\$ 1,533.82						
2/2/2021		8/1/2020		\$ 1,100.00	\$ 1,163.63	\$ (63.63)	\$ 1,082.45	\$ 1,533.82						
2/17/2021				\$ 353.88		\$ 353.88	\$ 1,436.33	\$ 1,533.82						
2/23/2021				\$ 343.71		\$ -	\$ 1,436.33	\$ 1,877.53						
3/3/2021		9/1/2020		\$ 4,901.84	\$ 1,163.63	\$ 3,738.21	\$ 5,174.54	\$ 1,877.53						
3/3/2021		10/1/2020			\$ 1,163.63	\$ (1,163.63)	\$ 4,010.91	\$ 1,877.53						
3/3/2021		11/1/2020			\$ 1,163.63	\$ (1,163.63)	\$ 2,847.28	\$ 1,877.53						
3/3/2021		12/1/2020			\$ 1,096.25	\$ (1,096.25)	\$ 1,751.03	\$ 1,877.53						
3/3/2021		1/1/2021			\$ 1,096.25	\$ (1,096.25)	\$ 654.78	\$ 1,877.53						
3/29/2021				\$ 515.56		\$ -	\$ 654.78	\$ 2,393.09						
3/29/2021						\$ -	\$ 654.78	\$ 2,393.09						
3/29/2021						\$ -	\$ 654.78	\$ 2,393.09						
3/30/2021		2/1/2021		\$ 1,100.00	\$ 1,096.25	\$ 3.75	\$ 658.53	\$ 2,393.09						
4/23/2021				\$ 255.41		\$ -	\$ 658.53	\$ (0.00)	\$ 2,648.50		Fees/Costs			
4/23/2021						\$ -	\$ 658.53	\$ (0.00)						
5/25/2021		3/1/2021		\$ 1,500.00	\$ 1,096.25	\$ 403.75	\$ 1,062.28	\$ (0.00)						
5/27/2021				\$ 3.99		\$ 3.99	\$ 1,066.27	\$ (0.00)			Relief Granted			
6/7/2021		4/1/2021		\$ 1,200.00	\$ 1,096.25	\$ 103.75	\$ 1,170.02	\$ (0.00)						
6/21/2021		5/1/2021		\$ 1,610.00	\$ 1,096.25	\$ 513.75	\$ 1,683.77	\$ (0.00)						
6/21/2021		6/1/2021			\$ 1,096.25	\$ (1,096.25)	\$ 587.52	\$ (0.00)						
6/21/2021						\$ 587.52	\$ (587.52)	\$ (0.00)	\$ (0.00)		Fees/Costs			
6/21/2021						\$ -	\$ (0.00)	\$ (0.00)	\$ (0.00)					
7/19/2021				\$ 600.00		\$ 600.00	\$ 600.00	\$ (0.00)						
8/2/2021		7/1/2021		\$ 600.00	\$ 1,096.25	\$ (496.25)	\$ 103.75	\$ (0.00)						
8/16/2021				\$ 600.00		\$ 600.00	\$ 703.75	\$ (0.00)						
8/30/2021		8/1/2021		\$ 600.00	\$ 1,096.25	\$ (496.25)	\$ 207.50	\$ (0.00)						
8/30/2021						\$ -	\$ 207.50	\$ (0.00)						
9/27/2021				\$ 800.00		\$ 800.00	\$ 1,007.50	\$ (0.00)						
10/12/2021		9/1/2021		\$ 400.00	\$ 1,096.25	\$ (696.25)	\$ 311.25	\$ (0.00)						
10/25/2021				\$ 500.00		\$ 500.00	\$ 811.25	\$ (0.00)						
11/9/2021		10/1/2021		\$ 475.00	\$ 1,096.25	\$ (621.25)	\$ 190.00	\$ (0.00)						
11/22/2021				\$ 900.00		\$ 900.00	\$ 1,090.00	\$ (0.00)						
12/6/2021		11/1/2021		\$ 350.00	\$ 1,096.25	\$ (746.25)	\$ 343.75	\$ (0.00)						
1/18/2022		12/1/2021		\$ 1,007.00	\$ 1,154.23	\$ (147.23)	\$ 196.52	\$ (0.00)						
2/18/2022		1/1/2022		\$ 2,589.47	\$ 1,154.23	\$ 1,435.24	\$ 1,631.76	\$ (0.00)						
2/18/2022		2/1/2022			\$ 1,154.23	\$ (1,154.23)	\$ 477.53	\$ (0.00)						
2/18/2022						\$ 76.19	\$ (76.19)	\$ (0.00)						
2/28/2022						\$ 600.00	\$ 131.31	\$ 468.69	\$ (0.00)					
3/14/2022		3/1/2022				\$ 600.00	\$ 1,154.23	\$ 567.00	\$ (0.00)					
								\$ (554.23)	\$ 315.80	\$ (0.00)				

Loan #:	
BK Case #:	1803400
Name:	Murphy
BK Filed	8/15/2018

Date Received	Contractual Due Date	Petition Due Date	Pre	Payment Amount	Amount Due	Difference	Post Suspense	Pre Suspense	Fees	Contractual from Pre	Comments	Principal	Interest	Principal Balance
5/25/2021		3/1/2021		\$ 1,500.00	\$ 1,096.25	\$ 403.75	\$ 1,062.28	\$ (0.00)						
5/27/2021				\$ 3.99		\$ 3.99	\$ 1,066.27	\$ (0.00)			Relief Granted			
6/7/2021		4/1/2021		\$ 1,200.00	\$ 1,096.25	\$ 103.75	\$ 1,170.02	\$ (0.00)						
6/21/2021		5/1/2021		\$ 1,610.00	\$ 1,096.25	\$ 513.75	\$ 1,683.77	\$ (0.00)						
6/21/2021		6/1/2021			\$ 1,096.25	\$ (1,096.25)	\$ 587.52	\$ (0.00)						
6/21/2021					\$ 587.52	\$ (587.52)	\$ (0.00)	\$ (0.00)			Fees/Costs			
6/21/2021						\$ -	\$ (0.00)	\$ (0.00)						
7/19/2021				\$ 600.00		\$ 600.00	\$ 600.00	\$ (0.00)						
8/2/2021		7/1/2021		\$ 600.00	\$ 1,096.25	\$ (496.25)	\$ 103.75	\$ (0.00)						
8/16/2021				\$ 600.00		\$ 600.00	\$ 703.75	\$ (0.00)						
8/30/2021		8/1/2021		\$ 600.00	\$ 1,096.25	\$ (496.25)	\$ 207.50	\$ (0.00)						
8/30/2021						\$ -	\$ 207.50	\$ (0.00)						
9/27/2021				\$ 800.00		\$ 800.00	\$ 1,007.50	\$ (0.00)						
10/12/2021		9/1/2021		\$ 400.00	\$ 1,096.25	\$ (696.25)	\$ 311.25	\$ (0.00)						
10/25/2021				\$ 500.00		\$ 500.00	\$ 811.25	\$ (0.00)						
11/9/2021		10/1/2021		\$ 475.00	\$ 1,096.25	\$ (621.25)	\$ 190.00	\$ (0.00)						
11/22/2021				\$ 900.00		\$ 900.00	\$ 1,090.00	\$ (0.00)						
12/6/2021		11/1/2021		\$ 350.00	\$ 1,096.25	\$ (746.25)	\$ 343.75	\$ (0.00)						
1/18/2022		12/1/2021		\$ 1,007.00	\$ 1,154.23	\$ (147.23)	\$ 196.52	\$ (0.00)						
2/18/2022		1/1/2022		\$ 2,589.47	\$ 1,154.23	\$ 1,435.24	\$ 1,631.76	\$ (0.00)						
2/18/2022		2/1/2022			\$ 1,154.23	\$ (1,154.23)	\$ 477.53	\$ (0.00)						
2/18/2022					\$ 76.19	\$ (76.19)	\$ 401.34	\$ (0.00)			Fees/Costs			
2/28/2022				\$ 600.00	\$ 131.31	\$ 468.69	\$ 870.03	\$ (0.00)			Fees/Costs			
3/14/2022		3/1/2022		\$ 600.00	\$ 1,154.23	\$ (554.23)	\$ 315.80	\$ (0.00)			Fees/Costs			
3/14/2022					\$ 270.03	\$ (270.03)	\$ 45.77	\$ (0.00)						
3/14/2022					\$ 45.77	\$ (45.77)	\$ (0.00)	\$ (0.00)			Fees/Costs			
4/25/2022		4/1/2022		\$ 1,155.00	\$ 1,154.23	\$ 0.77	\$ 0.77	\$ (0.00)			Fees/Costs			
4/25/2022					\$ 0.77	\$ (0.77)	\$ (0.00)	\$ (0.00)						
5/23/2022		5/1/2022		\$ 1,155.00	\$ 1,154.23	\$ 0.77	\$ 0.77	\$ (0.00)			Fees/Costs			
5/23/2022					\$ 0.77	\$ (0.77)	\$ (0.00)	\$ (0.00)						
7/18/2022		6/1/2022		\$ 1,155.00	\$ 1,154.23	\$ 0.77	\$ 0.77	\$ (0.00)			Fees/Costs			
8/29/2022		7/1/2022		\$ 1,155.00	\$ 1,154.23	\$ 0.77	\$ 1.54	\$ (0.00)						
9/26/2022		8/1/2022		\$ 1,155.00	\$ 1,154.23	\$ 0.77	\$ 2.31	\$ (0.00)						
10/20/2022		9/1/2022		\$ 1,165.00	\$ 1,154.23	\$ 10.77	\$ 13.08	\$ (0.00)						
11/21/2022		10/1/2022		\$ 1,154.23	\$ 1,154.23	\$ -	\$ 13.08	\$ (0.00)						
1/3/2023		11/1/2022		\$ 1,154.23	\$ 1,154.23	\$ -	\$ 13.08	\$ (0.00)						
1/30/2023		12/1/2022		\$ 1,241.20	\$ 1,241.29	\$ (0.09)	\$ 12.99	\$ (0.00)						
2/27/2023		1/1/2023		\$ 1,300.00	\$ 1,241.29	\$ 58.71	\$ 71.70	\$ (0.00)						
4/10/2023		2/1/2023		\$ 1,300.00	\$ 1,241.29	\$ 58.71	\$ 130.41	\$ (0.00)						
4/24/2023		3/1/2023		\$ 1,300.00	\$ 1,241.29	\$ 58.71	\$ 189.12	\$ (0.00)						
6/20/2023		4/1/2023		\$ 1,500.00	\$ 1,241.29	\$ 258.71	\$ 447.83	\$ (0.00)						
7/17/2023		5/1/2023		\$ 1,250.00	\$ 1,241.29	\$ 8.71	\$ 456.54	\$ (0.00)						
8/28/2023		6/1/2023		\$ 1,250.00	\$ 1,241.29	\$ (391.29)	\$ 65.25	\$ (0.00)						
10/23/2023		7/1/2023		\$ 1,658.62	\$ 1,241.29	\$ 417.33	\$ 482.94	\$ (0.00)						